

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KENNETH L. HOLLAND,)	
)	
Plaintiff,)	
)	
v.)	C. A. No. 05-464-SLR
)	
STANLEY TAYLOR, et al.,)	
)	
Defendants.)	

ADAM J. BRAMBLE,)	
)	
Defendant,)	
Counter-claim plaintiff,)	
)	
v.)	
)	
KENNETH L. HOLLAND)	
)	
Plaintiff,)	
Counter-claim defendant.)	

**DEFENDANT ADAM BRAMBLE'S RESPONSE
TO PLAINTIFF'S THIRD SET OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Adam Bramble responds to Plaintiff's Third Set of Interrogatories as follows:

GENERAL OBJECTIONS

1. Answering Defendant objects to the Interrogatories to the extent that they seek information or documents protected from disclosure by the attorney-client privilege, the work product doctrine, or any other applicable privilege.
2. Answering Defendant objects to the Interrogatories to the extent that they purport to require supplementation of these responses beyond that required by Federal Rule of Civil Procedure 26(e).

3. Answering Defendant objects to the Interrogatories to the extent that they purport to place duties upon them not set forth in, or contemplated by, the Federal Rules of Civil Procedure.

4. Answering Defendant objects to the Interrogatories to the extent that they purport to seek information or documents not in their possession, custody or control.

5. Answering Defendant objects to the Interrogatories to the extent that they seek the production of documents equally available to the Plaintiffs or Plaintiffs' counsel. Such documents will be identified by Answering Defendant but will not be produced.

6. Answering Defendant objects to the Interrogatories to the extent that they purport to require production of information or documents which are impractical or unduly burdensome to reproduce.

7. Answering Defendant objects to the Interrogatories to the extent that they seek the production of documents generated by or received from his counsel in connection with this litigation on or after the date of the acceptance of representation on the grounds that such documents are protected by attorney-client and work product privileges.

RESPONSES

Subject to, and without waiver of the foregoing General Objections and those set forth in Answering Defendant's Responses, Answering Defendant responds, after a reasonable search, and subject to supplementation, as follows:

1. Identify and describe in detail the events you allege unfolded:

RESPONSE: See Response to Interrogatory No. 14, Exhibit A filed September 28, 2006. [D.I.#48].

(a) The precise injury you sustained or injuries.

RESPONSE: See Response to Interrogatory No. 22, Exhibit A filed September 28, 2006.

(b) The manner in which they were sustained.

RESPONSE: See Response to Interrogatory No. 1.

(c) How you notified after the incident.

RESPONSE: This sentence is incomprehensible and therefore requires no response.

(d) Did you file a report or complaint? If so, whom did you file it with?

RESPONSE: See Response to Interrogatory No. 1.

**DEPARTMENT OF JUSTICE
STATE OF DELAWARE**

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
Deputy Attorney General
Delaware Department of Justice
820 N. French Street, 6th Floor
Wilmington, DE 19801
(302) 577-8400
Attorney for State Defendants

DATE: May 8, 2008

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2008, I electronically filed *Defendant Adam Bramble's Response to Plaintiff's Third Set of Interrogatories* with the Clerk of Court using CM/ECF. I hereby certify that on May 8, 2008, I have mailed by United States Postal Service, the document to the following non-registered party:

Kenneth Holland, Inmate
SBI#164800
Delaware Correctional Institution
1181 Paddock Road
Smyrna, DE 19977

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi
Catherine Damavandi (ID # 3823)
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